

RENE L. VALLADARES
Federal Public Defender
Nevada State Bar No. 11479
MONIQUE KIRTLEY
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Monique_Kirtley@fd.org

Attorney for Arlandell Moore

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ARLANDELL MOORE,
Defendant.

Case No. 2:18-cr-383-APG-EJY

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public Defender, counsel for Arlandell Moore, that the previously ordered deadline for filing of pretrial motions be vacated and that the parties herein shall have to and including November 22, 2019, within which to file the Defendant's pretrial motions currently due October 23, 2019.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including December 6, 2019, to file any and all responsive pleadings, currently due November 6, 2019.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including December 13, 2019, to file any and all replies to dispositive motions,
3 currently due November 13, 2019.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to complete necessary research
6 regarding a possible pretrial motion and time to discuss the results of the research with her
7 client.

8 2. The defendant is not incarcerated and does not object to the continuance.

9 3. The parties agree to the continuance.

10 4. The additional time requested herein is not sought for purposes of delay, but
11 merely to allow counsel for defendant sufficient time within which to discuss the proposed
12 resolution with her client.

13 5. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 This is the first stipulation to continue filed herein.

16 DATED this 24th day of October, 2019.

17 RENE L. VALLADARES
18 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

19 */s/ Monique Kirtley*
20 By _____
21 MONIQUE KIRTLEY
22 Assistant Federal Public Defender

/s/ Linda Mott.
By _____
LINDA MOTTA
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ARLANDELL MOORE,
Defendant.

Case No. 2:18-cr-383-APG-EJY

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to complete necessary research regarding a possible pretrial motion and time to discuss the results of the research with her client.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to discuss the proposed resolution with her client.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

111

111

111

ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including November 22, 2019, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including December 6, 2019 to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including December 13, 2019 to file any and all replies to dispositive motions.

DATED this 24th day of October, 2019.

UNITED STATES DISTRICT JUDGE